

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.<sup>1</sup>

Chapter 11

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**THIRD APPLICATION OF FREDRIKSON & BYRON, P.A. FOR ALLOWANCE OF  
FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE DEBTORS FROM  
OCTOBER 1, 2024 THROUGH OCTOBER 31, 2024**

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1. Steven R. Kinsella and Fredrikson & Byron, P.A. (collectively, “Fredrikson”) make this Application for allowance of fees for professional services rendered and for reimbursement of expenses incurred as Chapter 11 counsel for EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the “Debtors”) between October 1, 2024 and October 31, 2024 pursuant to 11 U.S.C. § 330.

2. In support of this Application, Fredrikson respectfully states as follows:

**JURISDICTION**

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue

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<sup>1</sup> In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Debtors’ address is 400 10th Street SE, Minot, ND 58701 and their Employer Identification Numbers (EINs) are as follows: 83-2840705 (EPIC Companies Midwest, LLC), 88-3709518 (EPIC Companies Midwest 2023, LLC), 88-4112082 (EPIC Employee, LLC), 88-0554720 (EOLA Capital, LLC) and 82-5331354 (EC West Fargo, LLC).

is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the “Petition Date”). The cases are currently pending before this Court.

4. This Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, and 331. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application is provided pursuant to the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court’s order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

### **BACKGROUND**

5. On the Petition Date, the Debtors filed an application to employ Fredrikson as Chapter 11 counsel for the Debtors effective July 8, 2024. (ECF No. 13.) The Court approved the application to employ Fredrikson on July 25, 2024. (ECF No. 49.) A copy of that order is attached as **Exhibit A**.

6. On the Petition Date, the Debtors also filed a motion for an order establishing interim compensation procedures. (ECF No. 11.) The Court entered an order on August 14, 2024 granting the motion and allowing Fredrikson to file monthly applications for compensation. (ECF No. 72.) A copy of that order is attached as **Exhibit B**.

7. This is Fredrikson’s third application for allowance of fees and expenses under 11 U.S.C. § 331. Fredrikson received court approval for the following prior fee applications:

<b><u>Fee Application Amount</u></b>	<b><u>Date of Order Approving Fee Application</u></b>	<b><u>Docket No.</u></b>
\$80,535.96	10/21/2024	148
\$20,172.00	11/14/2024	164
\$100,707.96		

8. Fredrikson believes that the Debtors are current in payment of ordinary operating expenses and any allowed administrative expenses, that any quarterly fees have been or will be paid as required to the United States Trustee, and that all monthly operating reports are being timely filed, including pursuant to any extensions granted by the United States Trustee.

### **RELIEF REQUESTED**

9. **Post-Petition Fees.** By this Application, Fredrikson requests allowance of fees for professional services rendered during these Chapter 11 cases between October 1, 2024 and October 31, 2024 in the amount of **\$36,375.00**, and reimbursement of expenses in the amount of **\$1,300.00**, for a total of **\$37,675.00**.

10. The professional services rendered by Fredrikson are detailed on the attached **Exhibit C**. Those services include the tasks specifically described below:

**(5000) Case Administration: \$168.00**

Services include submitting Word versions of proposed orders to the courtroom deputy and emailing the Chief Restructuring Officer (“CRO”) regarding orders entered.

<b><u>Name</u></b>	<b><u>Hours</u></b>	<b><u>Year</u></b>	<b><u>Hourly Rate</u></b>	<b><u>Fees</u></b>
Katherine A. Nixon	0.4	2024	\$420	\$168.00
<b>TOTAL</b>	<b>0.4</b>			<b>\$168.00</b>

Blended Hourly Rate:	\$420.00
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**(5001) Asset Analysis and Recovery: \$30,218.50**

Services include analyzing information regarding borrowers; communicating with borrowers and their counsel; requesting and reviewing real estate and lien records; meeting with the CRO and counsel for the Official Committee of Unsecured Creditors (“UCC”) regarding complaints against borrowers; drafting and revising complaints against borrowers; drafting settlement proposals; and meeting and communicating with interested banks.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	29.1	2024	\$575	\$16,732.50
Katherine A. Nixon	31.9	2024	\$420	\$13,398.00
Breann Jurek	0.4	2024	\$220	\$88.00
<b>TOTAL</b>	<b>61.4</b>			<b>\$30,218.50</b>

Blended Hourly Rate:	\$492.16
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**(5002) Asset Disposition: \$115.00**

Services include communicating with a potential real estate buyer.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.2	2024	\$575	\$115.00
<b>TOTAL</b>	<b>0.2</b>			<b>\$115.00</b>

Blended Hourly Rate:	\$575.00
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**(5006) Business Operations: \$1,226.50**

Services include communicating with the CRO regarding registered agent issues; changing registered agent information with the North Dakota Secretary of State; and analyzing a tax return issue.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.6	2024	\$575	\$345.00
Christy Carrier	4.1	2024	\$215	\$881.50
<b>TOTAL</b>	<b>4.7</b>			<b>\$1,226.50</b>

Blended Hourly Rate:	\$260.96
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**(5007) Claims Administration and Objections: \$672.00**

Services include reviewing and analyzing proofs of claim and discussing the same with the CRO.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Shataia Stallings	3.2	2024	\$210	\$672.00
<b>TOTAL</b>	<b>3.2</b>			<b>\$672.00</b>

Blended Hourly Rate:	\$210.00
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**(5010) Employment and Fee Applications: \$1,505.50**

Services include drafting a proposed order for Fredrikson's first fee application; drafting and finalizing Fredrikson's second fee application; assisting in preparing the CRO's quarterly compensation report for Q3 of 2024; and reviewing orders granting fee applications.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.5	2024	\$575	\$287.50
Katherine A. Nixon	2.9	2024	\$420	\$1,218.00
<b>TOTAL</b>	<b>3.4</b>			<b>\$1,505.50</b>

Blended Hourly Rate:	\$442.79
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**(5012) Financing and Cash Collateral: \$617.00**

Services include communicating with counsel for Bank Forward regarding the cash collateral stipulation; drafting the cash collateral stipulation; and reviewing the cash collateral order.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	1.0	2024	\$575	\$575.00
Katherine A. Nixon	0.1	2024	\$420	\$42.00
<b>TOTAL</b>	<b>1.1</b>			<b>\$617.00</b>

Blended Hourly Rate:	\$560.91
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**(5013) Meetings and Communications with Creditors: \$57.50**

Services include communicating with a creditor regarding a proof of claim filing.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.1	2024	\$575	\$57.50
<b>TOTAL</b>	<b>0.1</b>			<b>\$57.50</b>

Blended Hourly Rate:	\$575.00
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**(5015) Plan and Disclosure Statement: \$1,149.50**

Services include drafting and finalizing motion to extend exclusivity period.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.1	2024	\$575	\$57.50
Katherine A. Nixon	2.6	2024	\$420	\$1,092.00
<b>TOTAL</b>	<b>2.7</b>			<b>\$1,149.50</b>

Blended Hourly Rate:	\$425.74
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**(5018) Reporting: \$703.00**

Services include communicating with the CRO regarding monthly operating reports and assisting in the preparation of the same.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.2	2024	\$575	\$115.00
Katherine A. Nixon	0.7	2024	\$420	\$294.00
Shataia Stallings	1.4	2024	\$210	\$294.00
<b>TOTAL</b>	<b>2.3</b>			<b>\$703.00</b>

Blended Hourly Rate:	\$316.88
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**TOTAL POST-PETITION FEES: \$36,375.00**

11. **Reimbursement of Expenses.** In the course of this representation, Fredrikson has also incurred expenses detailed as part of Matter Nos. 5000 and 5006 on **Exhibit C**, and requests allowance thereof as follows:

<u>Expenses</u>	<u>Amount</u>
Owners & Encumbrance Report for EPIC Entities	\$250.00
Owners & Encumbrance Report for EPIC Entities	\$250.00
Owners & Encumbrance Report for EPIC Entities	\$250.00
Owners & Encumbrance Report for EPIC Entities	\$250.00
Owners & Encumbrance Report for EPIC Entities	\$250.00
Filing Fee – Registered Agent Change Forms	\$10.00
Filing Fee – Registered Agent Change Forms	\$10.00
Filing Fee – Registered Agent Change Forms	\$10.00
Filing Fee – Registered Agent Change Forms	\$10.00
Filing Fee – Registered Agent Change Forms	\$10.00
<b>TOTAL</b>	<b>\$1,300.00</b>

**TOTAL EXPENSES: \$1,300.00**

12. All services for which fees are requested by Fredrikson were performed for and on behalf of the Debtors, and not on behalf of any committee, creditor, or other person.

13. The amount requested constitutes reasonable compensation for actual, necessary services rendered by Fredrikson, based on the nature, the extent, and the value of such services, the time spent on such services, and the cost of comparable services other than in a case under Title 11. Fredrikson has not entered into any agreement, express or implied, with any other party-in-interest, including the Debtors, any creditor, receiver, trustee, or any representative of any of them, or with any attorney for such party-in-interest in the proceedings, for the purpose of fixing fees or other compensation to be paid to such party-in-interest in the proceedings for services rendered or expenses incurred from the assets of the estate in excess of the compensation allowed by law.

**WHEREFORE,** Fredrikson respectfully requests that the Court enter an order:

A. Allowing Fredrikson's fees incurred between October 1, 2024 and October 31, 2024 in the amount of **\$36,375.00**, and expenses in the amount of **\$1,300.00**, totaling **\$37,675.00**;

B. Authorizing the Debtors to pay Fredrikson such allowed postpetition fees and expenses;

C. Granting administrative expense priority to Fredrikson's allowed fees and expenses; and

D. Granting such other and further relief as may be just and proper.

Dated: November 15, 2024

*/e/ Steven R. Kinsella*

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Michael S. Raum (#05676)

**FREDRIKSON & BYRON, P.A.**

51 Broadway, Suite 400

Fargo, ND 58102-4991

701.237.8200

[mraum@fredlaw.com](mailto:mraum@fredlaw.com)

Steven R. Kinsella (#09514)

Katherine A. Nixon (*pro hac vice* MN #0402772)

**FREDRIKSON & BYRON, P.A.**

60 South 6<sup>th</sup> Street, Suite 1500

Minneapolis, MN 55402-4400

612.492.7000

[skinsella@fredlaw.com](mailto:skinsella@fredlaw.com)

[knixon@fredlaw.com](mailto:knixon@fredlaw.com)

**ATTORNEYS FOR DEBTORS**

**AFFIDAVIT**

I, Steven R. Kinsella, an attorney at the law firm of Fredrikson & Byron, P.A., declare under penalty of perjury that the foregoing Third Application of Fredrikson & Byron, P.A. for Allowance of Fees and Expenses as Chapter 11 Counsel for the Debtors from October 1, 2024 Through October 31, 2024 is true and correct according to the best of my knowledge, information, and belief.

Dated: November 11, 2024

/s/ Steven R. Kinsella  
Steven R. Kinsella

**EXHIBIT A**

## CourtAlert® Case Management

**From:** ecf@ndb.uscourts.gov  
**Sent:** 7/25/2024 12:56:27 PM  
**To:** nate\_olson@ndb.uscourts.gov  
**Subject:** Ch-11 24-30281 EPIC Companies Midwest, LLC Order on Application to Employ

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**CAUTION: EXTERNAL E-MAIL**

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**\*\*\*NOTE TO PUBLIC ACCESS USERS\*\*\*** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

**U.S. Bankruptcy Court**

**District of North Dakota**

Notice of Electronic Filing

The following transaction was received from vck, Court entered on 7/25/2024 at 12:56 PM CDT and filed on 7/25/2024

**Case Name:** EPIC Companies Midwest, LLC

**Case Number:** [24-30281](#)

**Document Number:** [49](#)

**Docket Text:**

Order Approving Application to Employ Steven R. Kinsella and Fredrikson & Byron, P.A. as counsel for Debtor EPIC Companies Midwest, LLC effective July 8, 2024 (Related Doc. [13]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. 329, 330. Applicant must also comply with Local Rules. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings (Text order only). Signed on 7/25/2024 (vck)

The following document(s) are associated with this transaction:

**24-30281 Notice will be electronically mailed to:**

Douglas Christensen on behalf of Creditor Beth Holmes  
dougc@grandforkslaw.com,  
sarah@grandforkslaw.com;jen@grandforkslaw.com;julie@grandforkslaw.com

Michael Gust on behalf of Interested Party Bank Forward  
mlgfilings@andersonbottrell.com, jernst@abstlaw.net

Joseph D Hackman on behalf of Interested Party Bank Forward  
jhackman@abstlaw.net

Peter B. Hankla on behalf of Interested Party Randy and Dorothy Henke  
phankla@mcgeelaw.com

Steven R Kinsella on behalf of Debtor EC West Fargo, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EOLA Capital, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest 2023, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Employee, LLC  
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

John M Krings, Jr. on behalf of Creditor Cornerstone Bank  
john@kaler-doeling.com, janae@kaler-doeling.com

Katherine A. Nixon on behalf of Debtor EPIC Companies Midwest, LLC  
knixon@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Richard P. Olson on behalf of Creditor Essential Living Inc  
rpolsonecf@minotlaw.com, rpolson@minotlaw.com

Richard P. Olson on behalf of Creditor Bruce & Diane Walker  
rpolsonecf@minotlaw.com, rpolson@minotlaw.com

Robert B. Raschke  
USTPRegion12.SX.ECF@usdoj.gov

Michael S Raum on behalf of Debtor EPIC Companies Midwest, LLC  
mraum@fredlaw.com, mraum@fredlaw.com;dtaylor@fredlaw.com

Katrina A. Turman Lang on behalf of Creditor Dietz Properties, LLC  
klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Candice Dietz  
klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Larry Dietz  
klang@woldlaw.com, melanie@turmanlaw.com

Sarah J. Wencil on behalf of U.S. Trustee Robert B. Raschke  
sarah.j.wencil@usdoj.gov

Benjamin Williams on behalf of Creditor Cullen Insulation, Inc.  
ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

Benjamin Williams on behalf of Creditor Daniel Frisch  
ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

**24-30281 Notice will not be electronically mailed to:**

**EXHIBIT B**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.

Chapter 11

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**ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND  
REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS**

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Debtors filed a Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief. Doc. 11. Pursuant to the notice of the Motion [Doc. 16], objections to the Motion were due by July 30, 2024.

Debtors served notice of the Motion. The Court received no objections to the Motion. The Court held a hearing on the Motion on August 14, 2024. Based upon the Motion and the Declaration of Patrick Finn [Doc. 6] and for the reasons stated on the record at the August 14, 2024, hearing, the Court finds that the circumstances of these cases warrant granting the relief provided below.

**IT IS ORDERED** that, except as otherwise provided in any order of the Court, professionals employed in this bankruptcy case, including Fredrikson & Byron, P.A., shall be permitted to seek interim payment of compensation and reimbursement of expenses by filing monthly applications for interim compensation and reimbursement of expenses.

**IT IS FURTHER ORDERED** that Debtors are authorized to pay all reasonable amounts invoiced by Lighthouse Management Group, Inc. (“Lighthouse”) for fees and expenses on a bi-weekly basis.

**IT IS FURTHER ORDERED** that Lighthouse will file with the Court and serve on Debtors, the United States Trustee, and any statutory committee appointed in this case (the “Notice Parties”) a monthly staffing report, filed and served by the 20th of each month for the previous month, identifying the Lighthouse employees who worked on this case, the total hours billed by Lighthouse, and a summary of the tasks performed. Lighthouse will also file with the Court and serve on the Notice Parties a quarterly compensation report by the 20th of each month following the end of a quarter, showing the total fees and expenses for the preceding quarter. These reports will be deemed applications for interim compensation under sections 328 and 330. Parties in interest may object to the reports within 21 days after notice. The Court will rule on the applications after the deadline to object passes or after a hearing on the application.

**IT IS FURTHER ORDERED** that Debtors will allocate the fees and expenses approved among Debtors pro rata if the professionals charge for tasks that generally apply to all cases and to the appropriate Debtor if the tasks relate solely to a specific Debtor.

Dated: August 14, 2024.



SHON HASTINGS, JUDGE  
UNITED STATES BANKRUPTCY COURT

**EXHIBIT C**

# Fredrikson

Invoice: 1888535  
Invoice Date: November 4, 2024  
Client Account: 097807.5000

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through October 31, 2024

**Regarding: Case Administration**

Total for Current Legal Fees:	\$ 168.00
Total For Current Costs and Other Charges:	\$ 1,250.00
<b>Total For Current Invoice:</b>	<b>\$ 1,418.00</b>

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**Please remit this page with your payment. Thank you. We appreciate your business.**

**Fredrikson**

Invoice: 1888535  
Invoice Date: November 4, 2024

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
10/07/24	1883336	2,654.50		2,654.50
<b>Total Prior Balance:</b>				<b>\$ 2,654.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of November 4, 2024. If payment has been sent close to this date, please verify payment status.

**Fredrikson**

Invoice: 1888535  
Invoice Date: November 4, 2024  
Client Account: 097807.5000

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

**Legal Fees**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/01/24	K. Nixon	Submit Word versions of proposed orders to courtroom deputy.	0.20	84.00
10/02/24	K. Nixon	Review orders entered and email CRO re: the same.	0.20	84.00
<b>Current Legal Fees:</b>			<b>0.40</b>	<b>\$ 168.00</b>

**Timekeeper Summary**

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	420.00	0.40	168.00
<b>Total</b>		<b>0.40</b>	<b>\$ 168.00</b>

**Costs and Other Charges**

	<u>Amount</u>
10/09/24 Prof Serv First American Title Insurance Company (PO Box 677858 Dallas TX 75267-7858) - 1724-1724145841 - O&E - [REDACTED]	250.00
10/09/24 Prof Serv First American Title Insurance Company (PO Box 677858 Dallas TX 75267-7858) - 1724-1724145842 - O&E - [REDACTED]	250.00
10/09/24 Prof Serv First American Title Insurance Company (PO Box 677858 Dallas TX 75267-7858) - 1724-1724145844 - O&E - [REDACTED]	250.00
10/09/24 Prof Serv First American Title Insurance Company (PO Box 677858 Dallas TX 75267-7858) - 1724-1724145843 - O&E - [REDACTED]	250.00
10/15/24 Prof Serv First American Title Insurance Company (PO Box 677858 Dallas TX 75267-7858) - 1724-1724145896 - O&E - [REDACTED]	250.00
<b>Current Costs and Other Charges:</b>	<b>\$ 1,250.00</b>



Invoice:  
Invoice Date:

1888535  
November 4, 2024  
Page: 2

**Invoice Totals**

Total for Current Legal Fees:	\$ 168.00
Total For Current Costs and Other Charges:	\$ 1,250.00
<b>Total For Current Invoice:</b>	<b>\$ 1,418.00</b>

# Fredrikson

Invoice: 1888536  
Invoice Date: November 4, 2024  
Client Account: 097807.5001

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through October 31, 2024

**Regarding: Asset Analysis and Recovery**

Total for Current Legal Fees: \$ 30,218.50

**Total For Current Invoice: \$ 30,218.50**

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**

[REDACTED]

Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**Please remit this page with your payment. Thank you. We appreciate your business.**



Invoice: 1888536  
Invoice Date: November 4, 2024

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
10/07/24	1883337	6,302.50		6,302.50
<b>Total Prior Balance:</b>				<b>\$ 6,302.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of November 4, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1888536  
Invoice Date: November 4, 2024  
Client Account: 097807.5001

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

**Legal Fees**

<b><u>Date</u></b>	<b><u>Timekeeper</u></b>	<b><u>Description</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
10/01/24	S. Kinsella	Analyze borrower information for complaints.	0.30	172.50
10/02/24	B. Jurek	Review O&E Report for [REDACTED]; e-mails regarding same.	0.20	44.00
10/02/24	S. Kinsella	Meeting with committee counsel regarding strategy to recover from project borrowers (2.5); meeting with project borrower counsel (.5); communications with client regarding the same (.5).	3.50	2,012.50
10/03/24	K. Nixon	Emails to CRO re: O&E reports.	0.10	42.00
10/03/24	B. Jurek	Review additional O&E Reports received from title.	0.20	44.00
10/07/24	S. Kinsella	Send documents to project borrower (.2); begin preparing complaints (.3).	0.50	287.50
10/08/24	S. Kinsella	Analyze project borrower documents and financial information for complaint preparation.	1.20	690.00
10/09/24	S. Kinsella	Prepare draft complaint (.8); communications with client regarding borrower information (.3); communications with lender for secured party of borrower (.3); review list of borrower party defendants (.1); research fraudulent transfer issue (.2).	1.70	977.50
10/09/24	K. Nixon	Draft complaint(s) for recovery of assets.	6.30	2,646.00
10/10/24	S. Kinsella	Review and revise complaint (.8); meeting with counsel for secured lender regarding project borrower (.7).	1.50	862.50
10/10/24	K. Nixon	Revise complaint(s) for recovery of assets and send to CRO for review (0.3); review email from CRO with additional documents (0.2).	0.50	210.00
10/11/24	S. Kinsella	Meeting with client regarding complaints.	1.30	747.50

# Fredrikson

Invoice:  
Invoice Date:

1888536  
November 4, 2024  
Page: 2

10/14/24	S. Kinsella	Communications with counsel for Bremer regarding [REDACTED]	0.10	57.50
10/15/24	S. Kinsella	Communications with CRO regarding status of [REDACTED] negotiations.	0.10	57.50
10/15/24	K. Nixon	Discuss draft complaint(s) with CRO.	0.30	126.00
10/16/24	S. Kinsella	Provide comments and edits on complaints.	0.70	402.50
10/16/24	K. Nixon	Revise complaint(s) for recovery of assets.	1.30	546.00
10/17/24	S. Kinsella	Communications with counsel for project borrower.	0.20	115.00
10/17/24	K. Nixon	Phone calls with CRO re: complaint(s).	0.40	168.00
10/18/24	S. Kinsella	Communications with client regarding complaints and communications with banks.	0.10	57.50
10/18/24	K. Nixon	Draft complaint(s) for recovery of assets.	4.60	1,932.00
10/21/24	S. Kinsella	Meeting with counsel for project borrower (.5); follow up communications with CRO (.3); meeting with CRO regarding status of borrower complaints (.8); prepare forbearance agreement (2.1); receive update regarding bank plan regarding project borrower (.2); analyze fraudulent transfer book entries (.3).	4.30	2,472.50
10/21/24	K. Nixon	Meeting with CRO regarding asset analysis (0.9); draft complaint(s) for recovery of assets (2.0).	2.90	1,218.00
10/22/24	K. Nixon	Phone call with CRO re: draft complaint(s) (0.3); draft complaint(s) for recovery of assets (0.9).	1.20	504.00
10/22/24	S. Kinsella	Analyze transfer issue regarding [REDACTED].	0.80	460.00
10/23/24	K. Nixon	Draft complaint(s) for recovery of assets.	4.70	1,974.00
10/23/24	S. Kinsella	Communications with CRO regarding bank meetings.	0.10	57.50
10/24/24	K. Nixon	Email CRO re: draft complaint(s) for recovery of assets.	0.10	42.00
10/24/24	S. Kinsella	Phone call with project borrower's counsel and CRO (.7); follow up call with CRO (.4); draft [REDACTED] complaint (1.9); review [REDACTED] complaint (.4).	3.40	1,955.00
10/25/24	S. Kinsella	Draft [REDACTED] complaint.	1.00	575.00
10/28/24	S. Kinsella	Meeting with CRO regarding complaints, negotiations, and upcoming pleadings (.5); draft and revise [REDACTED] complaint (2.3).	2.80	1,610.00



Invoice:  
Invoice Date:

1888536  
November 4, 2024  
Page: 3

10/28/24	K. Nixon	Meeting with CRO regarding asset analysis (0.5); email to CRO re: additional demand letter (0.1); draft complaint(s) for recovery of assets (0.4).	1.00	420.00
10/29/24	K. Nixon	Draft and finalize demand letter to borrower (0.4); draft complaint(s) for recovery of assets (0.2).	0.60	252.00
10/29/24	S. Kinsella	Revise [REDACTED] complaint.	0.40	230.00
10/30/24	S. Kinsella	Revise [REDACTED] complaint (.8); prepare settlement offers (1.9); communications with committee counsel regarding the complaints (.2); communications with CRO regarding the complaints (.3); review additional financial information in support of complaints (.3).	3.50	2,012.50
10/30/24	K. Nixon	Draft complaint(s) for recovery of assets.	4.30	1,806.00
10/31/24	S. Kinsella	Revise [REDACTED] complaint (.4); prepare and send settlement proposals (.8); communications with client regarding complaints (.4).	1.60	920.00
10/31/24	K. Nixon	Draft complaint(s) for recovery of assets.	3.60	1,512.00
<b>Current Legal Fees:</b>			<b>61.40</b>	<b>\$ 30,218.50</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	29.10	16,732.50
Katherine Nixon	420.00	31.90	13,398.00
Breann Jurek	220.00	0.40	88.00
<b>Total</b>		<b>61.40</b>	<b>\$ 30,218.50</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 30,218.50
<b>Total For Current Invoice:</b>	<b>\$ 30,218.50</b>

# Fredrikson

Invoice:  
Invoice Date:  
Client Account:

1888537  
November 4, 2024  
097807.5002

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through October 31, 2024

**Regarding: Asset Disposition**

Total for Current Legal Fees: \$ 115.00

**Total For Current Invoice: \$ 115.00**

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**



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Tax ID: [REDACTED]

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Invoice: 1888537  
Invoice Date: November 4, 2024  
Client Account: 097807.5002

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/01/24	S. Kinsella	Communications with potential real estate buyer.	0.20	115.00
	<b>Current Legal Fees:</b>		<b>0.20</b>	<b>\$ 115.00</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	0.20	115.00
<b>Total</b>		<b>0.20</b>	<b>\$ 115.00</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 115.00
<b>Total For Current Invoice:</b>	<b>\$ 115.00</b>

# Fredrikson

Invoice: 1888538  
Invoice Date: November 4, 2024  
Client Account: 097807.5007

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through October 31, 2024

**Regarding: Claims Administration and Objections**

Total for Current Legal Fees: \$ 672.00

**Total For Current Invoice: \$ 672.00**

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

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P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

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Invoice: 1888538  
Invoice Date: November 4, 2024

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
10/07/24	1883338	546.00		546.00
<b>Total Prior Balance:</b>				<b>\$ 546.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of November 4, 2024. If payment has been sent close to this date, please verify payment status.

# Fredrikson

Invoice: 1888538  
Invoice Date: November 4, 2024  
Client Account: 097807.5007

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

## Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/11/24	S. Stallings	Attention to filed proof of claims.	0.40	84.00
10/24/24	S. Stallings	Attention to EPIC claims reports for all Debtors and forward to M. Yenamandra (.4); telephone call with M. Yenamandra regarding same and timing for claims analysis (.3).	0.70	147.00
10/26/24	S. Stallings	Attention to proof of claim filings (.3); review claims and sort by Debtor (.8).	1.10	231.00
10/27/24	S. Stallings	Attention to EPIC claims filed under various debtors (.4); review and sort claims (.6).	1.00	210.00
<b>Current Legal Fees:</b>			<b>3.20</b>	<b>\$ 672.00</b>

## Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Shataia Stallings	210.00	3.20	672.00
<b>Total</b>		<b>3.20</b>	<b>\$ 672.00</b>

## Invoice Totals

Total for Current Legal Fees:	\$ 672.00
<b>Total For Current Invoice:</b>	<b>\$ 672.00</b>

# Fredrikson

Invoice: 1888539  
Invoice Date: November 4, 2024  
Client Account: 097807.5018

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through October 31, 2024

**Regarding: Reporting**

Total for Current Legal Fees: \$ 703.00

**Total For Current Invoice: \$ 703.00**

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

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Tax ID: [REDACTED]

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**Fredrikson**

Invoice: 1888539  
Invoice Date: November 4, 2024

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
09/05/24	1876154	7,565.50	(3,001.50)	4,564.00
10/07/24	1883359	1,648.00		1,648.00
<b>Total Prior Balance:</b>				<b>\$ 6,212.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of November 4, 2024. If payment has been sent close to this date, please verify payment status.

# Fredrikson

Invoice: 1888539  
Invoice Date: November 4, 2024  
Client Account: 097807.5018

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

## Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/16/24	S. Kinsella	Advise on MOR issue.	0.20	115.00
10/18/24	K. Nixon	Review September MORs.	0.30	126.00
10/18/24	S. Stallings	Attention to monthly operating reports for EPIC debtors and supporting documentation (.4); finalize and e-file monthly operating reports and forward bank records to UST (1.1).	1.40	294.00
10/22/24	K. Nixon	Attention to inquiry from CRO re: September MOR and Form 2-F.	0.40	168.00
<b>Current Legal Fees:</b>			<b>2.30</b>	<b>\$ 703.00</b>

## Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	0.20	115.00
Katherine Nixon	420.00	0.70	294.00
Shataia Stallings	210.00	1.40	294.00
<b>Total</b>		<b>2.30</b>	<b>\$ 703.00</b>

## Invoice Totals

Total for Current Legal Fees: \$ 703.00

**Total For Current Invoice: \$ 703.00**

**Fredrikson**

Invoice: 1888540  
Invoice Date: November 4, 2024  
Client Account: 097807.5006

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through October 31, 2024

**Regarding: Business Operations**

Total for Current Legal Fees:	\$ 1,226.50
Total For Current Costs and Other Charges:	\$ 50.00
<b>Total For Current Invoice:</b>	<b>\$ 1,276.50</b>

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

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Invoice: 1888540  
Invoice Date: November 4, 2024  
Client Account: 097807.5006

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

**Legal Fees**

<b><u>Date</u></b>	<b><u>Timekeeper</u></b>	<b><u>Description</u></b>	<b><u>Hours</u></b>	<b><u>Amount</u></b>
10/02/24	S. Kinsella	Communications with client regarding registered agent issue.	0.10	57.50
10/03/24	C. Carrier	Email communications with P. Finn regarding changes to registered agent; conduct research on ND Sec. of State website to verify company data; prepare summary email to P. Finn setting out procedural steps.	1.00	215.00
10/07/24	S. Kinsella	Communications with client regarding registered agent issue.	0.10	57.50
10/08/24	C. Carrier	Request access to records on ND Sec. of State website; prepare status email to P. Finn setting out next steps.	0.30	64.50
10/09/24	S. Kinsella	Communications with client regarding subpoena issue.	0.20	115.00
10/10/24	S. Kinsella	Attention to registered agent issue.	0.10	57.50
10/10/24	C. Carrier	Work on filing change of registered agent forms and change of address forms with ND Sec. of State (EPIC Companies Midwest LLC; EPIC Companies Midwest 2023 LLC; EPIC Employee, LLC; EC West Fargo LLC; and EOLA Capital, LLC); coordinate registered agent service with Cogency Global.	2.40	516.00
10/18/24	C. Carrier	Download and circulate recorded address and registered agent change amendments (x10); related email communications.	0.40	86.00
10/28/24	S. Kinsella	Analyze tax return issue.	0.10	57.50
<b>Current Legal Fees:</b>			<b>4.70</b>	<b>\$ 1,226.50</b>



Invoice: 1888540  
 Invoice Date: November 4, 2024  
 Page: 2

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	0.60	345.00
Christy Carrier	215.00	4.10	881.50
<b>Total</b>		<b>4.70</b>	<b>\$ 1,226.50</b>

### Costs and Other Charges

	<u>Amount</u>
10/15/24 US Bancorp (PO Box 6343 Fargo ND 58125) - Fargo 10152024 - ND Sec. of State filing fees for recording registered agent change forms: EPIC Companies Midwest LLC; EPIC Companies Midwest 2023 LLC; EPIC Employee LLC; EC West Fargo LLC; and EOLA Capital, LLC.	10.00
10/15/24 US Bancorp (PO Box 6343 Fargo ND 58125) - Fargo 10152024 - ND Sec. of State filing fees for recording registered agent change forms: EPIC Companies Midwest LLC; EPIC Companies Midwest 2023 LLC; EPIC Employee LLC; EC West Fargo LLC; and EOLA Capital, LLC.	10.00
10/15/24 US Bancorp (PO Box 6343 Fargo ND 58125) - Fargo 10152024 - ND Sec. of State filing fees for recording registered agent change forms: EPIC Companies Midwest LLC; EPIC Companies Midwest 2023 LLC; EPIC Employee LLC; EC West Fargo LLC; and EOLA Capital, LLC.	10.00
10/15/24 US Bancorp (PO Box 6343 Fargo ND 58125) - Fargo 10152024 - ND Sec. of State filing fees for recording registered agent change forms: EPIC Companies Midwest LLC; EPIC Companies Midwest 2023 LLC; EPIC Employee LLC; EC West Fargo LLC; and EOLA Capital, LLC.	10.00
10/15/24 US Bancorp (PO Box 6343 Fargo ND 58125) - Fargo 10152024 - ND Sec. of State filing fees for recording registered agent change forms: EPIC Companies Midwest LLC; EPIC Companies Midwest 2023 LLC; EPIC Employee LLC; EC West Fargo LLC; and EOLA Capital, LLC.	10.00

**Current Costs and Other Charges: \$ 50.00**

### Invoice Totals

Total for Current Legal Fees: \$ 1,226.50

Total For Current Costs and Other Charges: \$ 50.00

**Total For Current Invoice: \$ 1,276.50**

# Fredrikson

Invoice:  
Invoice Date:  
Client Account:

1888541  
November 4, 2024  
097807.5010

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through October 31, 2024

**Regarding: Employment and Fee Applications**

Total for Current Legal Fees: \$ 1,505.50

**Total For Current Invoice: \$ 1,505.50**

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

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Minneapolis, MN 55480-1484

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Invoice: 1888541  
Invoice Date: November 4, 2024

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
10/07/24	1883339	3,094.00		3,094.00
<b>Total Prior Balance:</b>				<b>\$ 3,094.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of November 4, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1888541  
 Invoice Date: November 4, 2024  
 Client Account: 097807.5010

EPIC Companies Midwest, LLC  
 Attn: Patrick Finn  
 900 Long Lake Rd, Suite 180  
 Lighthouse Management Group, Inc.  
 New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/07/24	S. Kinsella	Review and finalize invoices for second fee application.	0.10	57.50
10/07/24	K. Nixon	Draft proposed order for Fredrikson first fee app and submit the same to chambers.	0.40	168.00
10/14/24	K. Nixon	Draft Fredrikson's second fee application.	1.30	546.00
10/15/24	K. Nixon	Email CRO re: order approving first monthly staffing report (0.1); prepare second monthly staffing report (0.1).	0.20	84.00
10/16/24	S. Kinsella	Review and revise second fee application.	0.20	115.00
10/16/24	K. Nixon	Finalize Fredrikson's second fee application and email CRO copy of the same.	0.40	168.00
10/17/24	K. Nixon	Email CRO re: September MOR (0.1); draft quarterly report for Q3 of 2024 (0.3).	0.40	168.00
10/18/24	K. Nixon	Finalize CRO's quarterly report for Q3 2024.	0.20	84.00
10/21/24	S. Kinsella	Review orders granting fee applications.	0.20	115.00
<b>Current Legal Fees:</b>			<b>3.40</b>	<b>\$ 1,505.50</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	0.50	287.50
Katherine Nixon	420.00	2.90	1,218.00
<b>Total</b>		<b>3.40</b>	<b>\$ 1,505.50</b>



Invoice:

1888541

Invoice Date:

November 4, 2024

Page: 2

**Invoice Totals**

Total for Current Legal Fees: \$ 1,505.50

**Total For Current Invoice: \$ 1,505.50**

**Fredrikson**

Invoice: 1888542  
Invoice Date: November 4, 2024  
Client Account: 097807.5012

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through October 31, 2024

**Regarding: Financing and Cash Collateral**

Total for Current Legal Fees: \$ 617.00

**Total For Current Invoice: \$ 617.00**

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

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Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

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Invoice: 1888542  
Invoice Date: November 4, 2024

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
10/07/24	1883340	2,510.00		2,510.00
<b>Total Prior Balance:</b>				<b>\$ 2,510.00</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of November 4, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1888542  
Invoice Date: November 4, 2024  
Client Account: 097807.5012

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/02/24	S. Kinsella	Communications with alleged secured lender regarding cash collateral stipulation.	0.10	57.50
10/07/24	S. Kinsella	Finalize cash collateral stipulation.	0.40	230.00
10/08/24	K. Nixon	Review cash collateral order.	0.10	42.00
10/08/24	S. Kinsella	Revise and finalize cash collateral stipulation.	0.50	287.50
<b>Current Legal Fees:</b>			<b>1.10</b>	<b>\$ 617.00</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	1.00	575.00
Katherine Nixon	420.00	0.10	42.00
<b>Total</b>		<b>1.10</b>	<b>\$ 617.00</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 617.00
<b>Total For Current Invoice:</b>	<b>\$ 617.00</b>

# Fredrikson

Invoice: 1888543  
Invoice Date: November 4, 2024  
Client Account: 097807.5013

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through October 31, 2024

**Regarding: Meetings and Communications with Creditors**

Total for Current Legal Fees: \$ 57.50

**Total For Current Invoice: \$ 57.50**

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**Please remit this page with your payment. Thank you. We appreciate your business.**

**Fredrikson**

Invoice: 1888543  
Invoice Date: November 4, 2024

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
10/07/24	1883357	3,359.50		3,359.50
<b>Total Prior Balance:</b>				<b>\$ 3,359.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of November 4, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1888543  
Invoice Date: November 4, 2024  
Client Account: 097807.5013

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/29/24	S. Kinsella	Phone call from creditor regarding proof of claim filing.	0.10	57.50
<b>Current Legal Fees:</b>			<b>0.10</b>	<b>\$ 57.50</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	0.10	57.50
<b>Total</b>		<b>0.10</b>	<b>\$ 57.50</b>

### Invoice Totals

Total for Current Legal Fees:	\$ 57.50
<b>Total For Current Invoice:</b>	<b>\$ 57.50</b>

# Fredrikson

Invoice: 1888544  
Invoice Date: November 4, 2024  
Client Account: 097807.5015

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through October 31, 2024

**Regarding: Plan and Disclosure Statement**

Total for Current Legal Fees: \$ 1,149.50

**Total For Current Invoice: \$ 1,149.50**

**NOTE:** Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

***Payment is due within 30 days from receipt of invoice***

If you have any questions please email [accounting@fredlaw.com](mailto:accounting@fredlaw.com) or contact a client representative at 612.492.7574.

**Remittance Address:**

Fredrikson & Byron P.A.  
P.O. Box 1484  
Minneapolis, MN 55480-1484

**Online Payments:**

[Fredlaw.com/payment](https://fredlaw.com/payment)

**Wire Instructions:**



Please send remittance information to [paynotification@fredlaw.com](mailto:paynotification@fredlaw.com)

Tax ID: [REDACTED]

**Please remit this page with your payment. Thank you. We appreciate your business.**

**Fredrikson**

Invoice: 1888544  
Invoice Date: November 4, 2024

**Prior Balance Due Detail**

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
10/07/24	1883358	57.50		57.50
<b>Total Prior Balance:</b>				<b>\$ 57.50</b>

To avoid duplicate payments, the Prior Balance reflects what was still due as of November 4, 2024. If payment has been sent close to this date, please verify payment status.



Invoice: 1888544  
Invoice Date: November 4, 2024  
Client Account: 097807.5015

EPIC Companies Midwest, LLC  
Attn: Patrick Finn  
900 Long Lake Rd, Suite 180  
Lighthouse Management Group, Inc.  
New Brighton, MN 55112

### Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/21/24	S. Kinsella	Review motion to extend exclusivity period.	0.10	57.50
10/21/24	K. Nixon	Draft motion to extend exclusivity period.	2.20	924.00
10/22/24	K. Nixon	Finalize motion to extend exclusivity period.	0.40	168.00
<b>Current Legal Fees:</b>			<b>2.70</b>	<b>\$ 1,149.50</b>

### Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	575.00	0.10	57.50
Katherine Nixon	420.00	2.60	1,092.00
<b>Total</b>		<b>2.70</b>	<b>\$ 1,149.50</b>

### Invoice Totals

Total for Current Legal Fees: \$ 1,149.50

**Total For Current Invoice: \$ 1,149.50**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NORTH DAKOTA**

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In re:

**Jointly Administered**

EPIC Companies Midwest, LLC,  
EPIC Companies Midwest 2023, LLC,  
EPIC Employee, LLC,  
EOLA Capital, LLC, and  
EC West Fargo, LLC,

Bankruptcy No. 24-30281  
Bankruptcy No. 24-30282  
Bankruptcy No. 24-30283  
Bankruptcy No. 24-30284  
Bankruptcy No. 24-30285

Debtors.

Chapter 11

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**NOTICE OF THIRD APPLICATION OF FREDRIKSON & BYRON, P.A. FOR  
ALLOWANCE OF FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE  
DEBTORS FROM OCTOBER 1, 2024 THROUGH OCTOBER 31, 2024**

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TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

1. **NOTICE IS HEREBY GIVEN** that Fredrikson & Byron, P.A., as Chapter 11 counsel for the Debtors, has filed its third application for allowance of fees and expenses, a copy of which is attached hereto and served upon you.

2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **Friday, December 6, 2024, which is twenty-one (21) days from the date of the filing of this Notice**. Any objections not filed and served may deemed waived.

Dated: November 15, 2024

*/e/ Steven R. Kinsella*

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Michael S. Raum (#05676)

**FREDRIKSON & BYRON, P.A.**

51 Broadway, Suite 400

Fargo, ND 58102-4991

701.237.8200

[mraum@fredlaw.com](mailto:mraum@fredlaw.com)

Steven R. Kinsella (#09514)

Katherine A. Nixon (*pro hac vice* MN #0402772)

**FREDRIKSON & BYRON, P.A.**

60 South 6<sup>th</sup> Street, Suite 1500

Minneapolis, MN 55402-4400

612.492.7000

[skinsella@fredlaw.com](mailto:skinsella@fredlaw.com)

[knixon@fredlaw.com](mailto:knixon@fredlaw.com)

**ATTORNEYS FOR DEBTORS**